

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Dkt. No. 16-CR-10225-DPW
EDWARD J. TUTUNJIAN	)	
	)	
&	)	
	)	
EJT MANAGEMENT, INC.	)	
_____	)	

**CLARIFICATION TO EDWARD TUTUNJIAN'S SENTENCING MEMORANDUM**

Defendant Edward Tutunjian hereby corrects and clarifies the argument in his Sentencing Memorandum that contains the following sentence, which appears on page four of his memorandum in reference to a former undocumented employee, and which states, "When asked several times before the grand jury whether he felt that he had been underpaid or exploited by Mr. Tutunjian, this man answered repeatedly that he had not been exploited."

After Mr. Tutunjian's Sentencing Memorandum was filed, the government informed undersigned counsel that the above-quoted statement does not appear in the transcript of the questions and answers posed to the former employee in the grand jury. Mr. Tutunjian's counsel made this statement in his memorandum based on information provided by the former employee's counsel. Mr. Tutunjian withdraws the above-quoted statement and substitutes the following language in its place:

The witness's counsel reports that, during his government interview (11/12/13) and during his two grand jury appearances (11/20/13 and 9/15/15), he was asked repeatedly about how much he worked and what his compensation was, which appeared to him and his counsel to be an inquiry into whether he had been fairly paid or exploited. He responded that he received several raises upon the birth of his children and his hourly wage at time of his termination were \$16 per

hour. Apparently, he was also asked whether the severance money was paid to influence his testimony. He answered that the severance money was to assist him and his family until he could find another job.

DATED: December 9, 2016

Respectfully submitted,

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*Counsel to Edward J. Tutunjian*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the within document on counsel of record via the ECF system.

Dated: December 9, 2016

/s/ Philip G. Cormier  
Philip G. Cormier